

# EXHIBIT 112

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,  
MASSACHUSETTS,  
WASHINGTON, COLORADO,  
CONNECTICUT, DELAWARE,  
DISTRICT OF COLUMBIA,  
HAWAII, ILLINOIS, IOWA, NEW  
MEXICO, NORTH CAROLINA,  
OREGON, PENNSYLVANIA,  
RHODE ISLAND, VERMONT, and  
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official  
capacity as President of the United  
States; U.S. DEPARTMENT OF  
HOMELAND SECURITY; ELAINE  
C. DUKE, in her official capacity; U.S.  
CITIZENSHIP AND IMMIGRATION  
SERVICES; U.S. IMMIGRATION  
AND CUSTOMS ENFORCEMENT;  
and the UNITED STATES OF  
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228  
(NGG) (JO)

### DECLARATION OF BARBARA KANNINEN

Pursuant to 28 U.S.C. § 1746 (2), I, Barbara Kanninen, hereby declare as follows:

1. I am the Chair of the Arlington School Board and serve Arlington Public Schools (APS).  
As a member of the School Board I have served as a liaison to the Budget Advisory Committee, Joint Facilities Advisory Commission, South Arlington Working Group, Whole Child Working Group, Arlington Partnership for Children, Youth, and Families, and Student Advisory Board. Previously, I have served on the School Board's Early Childhood Advisory Committee, Math Advisory Committee, and Advisory Council on Instruction, as well as the Arlington County's Board's Fiscal Affairs Advisory Committee and the Board of the Youth Ultimate League of Arlington. I have personal knowledge of the matters set forth below or have knowledge of those matters based on my review of information and records gathered by members of my staff.
2. APS is 13th largest among Virginia's 132 school divisions, situated in a region with the largest immigrant populations in the state, and has a historic tradition of educating immigrants. APS' richly diverse students hail from 96 nations and speak 81 languages. APS is a diverse and inclusive school community, committed to academic excellence and integrity. APS provides instruction in a caring, safe and healthy learning environment, responsive to each student, in collaboration with families and the community.<sup>1</sup> APS is committed to admitting, enrolling, and teaching students regardless of their national origin or immigration or citizenship status.<sup>2</sup>

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<sup>1</sup> APS Vision Statement. See <https://www.apsva.us/arlington-public-schools-overview/>.

<sup>2</sup> Arlington Public Schools Affirms Its Commitment to Be Welcoming & Open to ALL Students (2017, September 6). Retrieved from <https://www.apsva.us/post/arlington-public-schools-affirms-commitment-welcoming-open-students/>.

3. The Deferred Action for Childhood Arrivals ("DACA") program provides real, meaningful benefits to residents of Arlington, including students that may attend APS. For as long as they have active DACA protection, DACA participating students attending APS can pursue their educational endeavors, without fear or anxiety of sudden detention or removal. Discontinuance of DACA will reintroduce fear and uncertainty into their lives making it hard for them to learn, and inhibit a positive learning environment for all students. DACA students would be subject to deportation and likely lose their sense of educational purpose.
4. The elimination of the DACA program would also negatively affect APS' investment of significant financial and human resources in teaching all of its students. Most significantly, the elimination of the DACA program will undermine Arlington Public Schools' unwavering commitment to diversity and inclusion, and its commitment to support all students, including DACA students, achieve their goals and dreams.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on: September 28, 2017



Barbara Kanninen